

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# INT-010-2.1 – Interchange Initiation and Modification for Reliability

***This section to be completed by the Compliance Enforcement Authority.***

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| --- | --- |
| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:** | Registered name of entity being audited |
| **NCR Number:** | NCRnnnnn |
| **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:** | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:** | Supplied by CEA |

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **PA** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** | X |  |  |  |  |  |  |  |  |  |  |  |
| **R2** | X |  |  |  |  |  |  |  |  |  |  |  |
| **R3** | X |  |  |  |  |  |  |  |  |  |  |  |

**Legend:**

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| --- | --- |
| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

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| --- | --- | --- | --- |
| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |

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| **Req.** | **Areas of Concern** |
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| **Req.** | **Recommendations** |
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| **Req.** | **Positive Observations** |
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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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R1 Supporting Evidence and Documentation

**R1**. The Balancing Authority that experiences a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement shall ensure that a Request for Interchange (RFI) is submitted with a start time no more than 60 minutes beyond the resource loss. If the use of the energy sharing agreement does not exceed 60 minutes from the time of the resource loss, no RFI is required.

1. The Balancing Authority that uses its energy sharing agreement where the duration exceeds 60 minutes shall have evidence such as dated and time-stamped RFI, electronic logs or other similar evidence that it submitted an RFI per Requirement R1. (R1)

**Registered Entity Response (Required):**

**Question:** Did entity experience a loss of resources, or other reliability needs that exceeded 60 minutes, covered by an energy sharing agreement during the compliance monitoring period?  Yes  No

If yes, proceed to Evidence Requested section below.

If no, Requirement R1 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:[[3]](#endnote-1)

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| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances during the compliance monitoring period where entity experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement that was used for at least 60 minutes from the time of resource loss. |
| Dated and time-stamped RFI, electronic logs, or other similar evidence of resource loss and evidence that entity submitted an RFI per Requirement R1. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-010-2.1, R1

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R1) For all, or a sample of, instances where the entity experienced a loss of resources covered by an energy sharing agreement or other reliability needs covered by an energy sharing agreement (per Requirement R1), examine evidence to verify entity ensured that a RFI was submitted with a start time no more than 60 minutes beyond the resource loss (and otherwise in accordance with Requirement R1.) |
| **Note to Auditor:** | |

Auditor Notes:

R2 Supporting Evidence and Documentation

1. Each Sink Balancing Authority shall ensure that a Reliability Adjustment Arranged Interchangereflecting a modification is submitted within 60 minutes of the start of the modification if a Reliability Coordinator directs the modification of a Confirmed Interchange or Implemented Interchange for actual or anticipated reliability-related reasons.
2. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other similar evidence that a Reliability Adjustment Arranged Interchange was submitted within 60 minutes of the start of a modification to either a Confirmed Interchange or an Implemented Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R2)

**Registered Entity Response (Required):**

**Question:** Has a Reliability Coordinator directed the entity modify a Confirmed Interchange or Implemented Interchange (per Requirement R2) during the compliance monitoring period?  Yes  No

If yes, proceed to Evidence Requested section below.

If no, Requirement R2 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances during the compliance monitoring period where the entity was directed by a Reliability Coordinator to modify a Confirmed Interchange or Implemented Interchange (per Requirement R2). |
| Dated and time-stamped electronic logs or other similar evidence of both the direction from the Reliability Coordinator to modify a Confirmed or Implemented Interchange and that a Reliability Adjustment Arranged Interchange was submitted within 60 minutes of the start of the modification (per Requirement R2). |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-010-2.1, R2

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R2) For all, or a sample of, instances where the entity was directed by a Reliability Coordinator to modify a Confirmed or Implemented Interchange, review evidence to verify entity submitted a Reliability Adjustment Arranged Interchange within 60 minutes of the start of the modification (per Requirement R2). |
| **Note to Auditor:** | |

Auditor Notes:

R3 Supporting Evidence and Documentation

1. Each Sink Balancing Authority shall ensure that a Request for Interchange is submitted reflecting that Interchange Schedule within 60 minutes of the start of the scheduled Interchange if a Reliability Coordinator directs the scheduling of Interchange for actual or anticipated reliability-related reasons.
2. The Sink Balancing Authority shall have evidence such as dated and time-stamped electronic logs or other evidence that a Request for Interchange was submitted reflecting that Interchange Schedule within 60 minutes of the start of any scheduled Interchange that was directed by a Reliability Coordinator for actual or anticipated reliability-related reasons. (R3)

**Registered Entity Response (Required):**

**Question:** Was entity directed by a Reliability Coordinator to direct the scheduling of Interchange (per Requirement R1) during the compliance monitoring period?  Yes  No

If yes, proceed to Evidence Requested section below.

If no, Requirement R3 is not applicable.

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| A list of instances where the entity was directed by a Reliability Coordinator to schedule Interchange (per Requirement R1) |
| Dated and time-stamped electronic logs or other evidence of both the direction from a Reliability Coordinator to schedule Interchange and the entity’s submission of the Request for Interchange within 60 minutes of such direction (Per Requirement R1) |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to INT-010-2.1, R3

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R3) For all ,or a sample of, instances where entity was directed by a Reliability Coordinator to schedule Interchange, review evidence and verify that entity submitted a Request for Interchange within 60 minutes of such direction (per Requirement R1). |
| **Note to Auditor:** | |

Auditor Notes:

Additional Information:

Reliability Standard



Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable Reliability Standards. The Sampling Methodology Guidelines and Criteria document, provided by NERC establishes a minimum set of guidelines for selecting a sample set of equipment or evidence in audits of registered entities.

Regulatory References

FERC Orders

Letter Order

FERC June 30, 2014 Order approving Reliability Standards for Interchange Scheduling and Coordination, including INT-010-2: North American Electric Reliability Corp.., Docket No. RD14-4-000 (June 30, 2014) (letter order).

<http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/INT%20Letter%20Order.pdf>

Page 2. FERC approved “Reliability Standard INT-010-2 [which] provides guidance for required actions on a confirmed interchange for reliability reasons. Reliability Standard INT-010-2 provides clarity as to which entity is required to perform a reliability-related task during an interchange transaction.”

Order No. 693

P 887 In the order approving INT-010-1, FERC stated “…we adopt the interpretation set forth in the NOPR [Notice of Proposed Rulemaking] that these current or imminent reliability-related reasons do not include actual IROL[Interconnection Reliability Operating Limit] violations, since they require immediate control actions so that the system can be returned to a secure operating state as soon as possible after a reliability-related system interruption – a period that is much shorter than the time that is expected to be required for new or modified transactions to be implemented.”

Revision History for RSAW

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| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 2/23/2018 | NERC Compliance Assurance, RSAW Task Force | New Document contains a minor revision to update to INT-010-2.1 |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. This document should not be treated as a substitute for the Reliability Standard or as additional Reliability Standard requirements. To determine compliance with the Reliability Standard, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW. NERC’s Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The RSAW may provide a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserve the right to request additional evidence from the registered entity that is not included in this RSAW. This RSAW may include excerpts from FERC Orders and other regulatory references which are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

   This RSAW includes excerpts from Federal Energy Regulatory Commission (FERC) Orders and other regulatory references, where applicable. The FERC Order cites are provided for ease of reference only, and this document does not include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)